To Docket Clerk   Maine Dept. of Agriculture
Fruit and Vegetable Programs   May 17, 2006
USDA- AMS
1400 Independence Ave. SW Stop 0243
Washington, DC 20250-0243

Comments in reference to Docket No. FV06-1290-1PR
From Federal Register April 20, 2006, Volume 71, Number 76, pages 20353-20357
Specialty Crop Block Grant Program

Comments:
1
The intent of the SCBGP is *not* to be competitive between the states. The rule is written as if
the grants are competitive. Could the language be modified as suggested below?

> Sec. 1290.7 Review of Grant Application
> (b) " Incomplete applications as of the deadline for submission will not be considered."

We feel that there should **be a rolling application period** and the only deadline imposed
would be "within the fiscal year."
We recommend that the (b) language be deleted and replaced by " Applications must be
submitted before the end of the fiscal year or the state will forfeit their right to receive funds."

2
Sec. 1290.6   Completed application.

Overall, it is our opinion that the reporting requirements for this grant are onerous and more
time-consuming than the modest estimated burden provided by AMS in the Paperwork
Reduction Act section. Again, since this is not a competitive grant, **why is the information
required based on the Competitiveness Act of 2004?**

We would like to see a **short application**, perhaps a template for all states to use, or simply
a request to describe the concept or plan for utilizing the funds. The rule implies that AMS
wants all the information up front in a plan, with a 200 word description of **each proposed
project**, including purpose, potential impact, financial feasibility, expected measurable
outcomes, goals, work plan, project oversight, and project commitment from partners. This
poses a serious problem for all states because of the following:

 1. States do not yet know how much money they will be getting, beyond the $100,000.
 2. States would have to seek partners and decide on projects well in advance of applying.
 3. Oversight, record-keeping and financial management will be compounded by the number
 of projects proposed, having a stifling effect on the state's interest or willingness to spread
 around the funds to various partners and organizations. Not knowing how much money or
 when the funds will be available or what activities will be allowed inhibits the states from
 having discussions with outside partners for fear of raising expectations.
Again, **assuming this is not a competitive grant, it should be sufficient for each state to
adequately represents their intentions to use the money appropriately through a short
application form, rather than be subject to   the 7CFR part 3016 (FSMIP) or some other
grant program guidelines.**

In addition to the above concerns, we believe that the amount of time estimated by AMS to
prepare the applications and the reports is grossly understated. Many hours of planning
would have to occur before a state could prepare an application that might include multiple
projects and project partners.

#3.
Sec. 1290.8 Grant agreements

Under (b), assuming that it will be allowed, we would like some language indicating the allowance for sub-recipients, and whether sub-recipients would be subject to the same reporting requirements and financial audit requirements as the applicant.

Some additional questions:
 1.What definition of Specialty Crops is being used? The 2002 SCBGP included all crops except for corn, soy, cotton, peanuts, wheat and tobacco.
 2.Will specific crops, such as potatoes, dry peas, seeds, wine, be included?
 3. What does "enhance the competitiveness " mean? How broadly can we interpret this?
 5. Will states find out in advance how much money they will be eligible for? When?
 6. Will the financial audits being required be done internally, or must the states hire an outside auditor? How will this audit requirement affect sub-contractors?

Thank you for your consideration of these comments and suggestions.
Sincerely,
Mary Ellen Johnston
Maine Department of Agriculture
Marketing Division